



Miedel & Mysliwiec LLP

April 1, 2020

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Clifford Taylor, 19-CR-410

Dear Judge Failla:

As the parties have gotten close to working out the logistics for Mr. Taylor's release, should the Court order it, [REDACTED]
[REDACTED]
[REDACTED]

As a result, I respectfully request the Court to issue an order to the MCC to conduct an immediate COVID-19 test of Mr. Taylor to determine whether or not he is infected. If the test returns as negative, then I would request that Mr. Taylor be immediately released on the conditions as set forth in the letter filed by the government simultaneously with this one.

I understand that Mr. Taylor is currently in quarantine. However, he is in quarantine with 30 other men, some of whom were directly exposed to individuals who tested positive, and that quarantine will not end for some time. I am seriously concerned that the longer Mr. Taylor remains in the unit, the greater the chance that he will contract the virus. I am hopeful that the results of testing could be clear within a few days and would allow for his release as soon as possible.

The government has informed me that it does not take a position on my request for an order for immediate testing. For informational purposes, Judge Engelmayer yesterday ordered the immediate testing of Bryant Brown, 20-CR-12, who is also detained at the MCC.

Thank you for your consideration.

Respectfully,

/s/

Florian Miedel
Attorney for Clifford Taylor

cc: AUSA Daniel Wolf

The Court has spoken this afternoon with in-house counsel at the MCC, who advised the Court, first, that the MCC has no on-site COVID-19 testing capabilities, and second, that there are many practical impediments at this time to removing Mr. Taylor from the MCC and transporting him to a facility where he could be tested. Given these facts, [REDACTED]

[REDACTED] the Court will not order the MCC to test Mr. Taylor.

Date: New York, New York
April 1, 2020

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE